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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA	)	CR No. 14-00175 TEH
	)	
Plaintiff,	)	JOINT STATUS CONFERENCE STATEMENT,
	)	STIPULATION TO EXCLUDE TIME UNDER
v.	)	THE SPEEDY TRIAL ACT
	)	
PACIFIC GAS AND ELECTRIC	)	
COMPANY,	)	
	)	
Defendant.	)	
	)	

The United States of America, by and through Melinda Haag, United States Attorney for the Northern District of California, and Kim A. Berger and Hallie M. Hoffman, Assistant United States Attorneys for the Northern District of California, and the defendant, Pacific Gas and Electric Company, and their attorneys Steven M. Bauer, Esq., Margaret Tough, Esq., and Walter F. Brown, Jr., Esq. submit the following Joint Status Conference Statement:

1. The parties have met and conferred regarding a schedule in this matter.

2. The parties jointly propose a schedule as follows:

Discovery Motions

- a. April 27, 2015 – opening briefs due
- b. May 4, 2015 – responsive briefs due
- c. May 18, 2015 – reply briefs due
- d. June 1, 2015 at 2:00 p.m. – motions hearing held

Expert Disclosures

Parties continue to discuss potential dates and will submit proposed dates to the Court at a later time.

Grand Jury Disclosures

- a. October 5, 2015 – Disclosure of remaining grand jury transcripts

Further Motions

- a. September 7, 2015 – opening briefs due
- d. September 21, 2015 -- opposition briefs due
- e. October 5, 2015 – reply briefs due
- f. October 19, 2015 at 2:00 p.m. – motions hearing held

The parties anticipate additional motions may be required. As a general matter, the parties agree to use best efforts to follow this schedule: To give one week's notice to the other party of a potential motion, followed by two weeks for opposition, one week for reply, and two weeks for the Court to prepare for the hearing.

Pre-Trial Litigation

- a. Parties continue to discuss and will submit a proposed date to the Court at a later time – Rule 404(b) notice due
- b. January 4, 2016 – Motions in Limine due
- c. January 18, 2016 – Motions in Limine oppositions due
- d. February 1, 2016 – Motions in Limine replies due
- e. February 8, 2016 – Pretrial filings due

f. February 22, 2016 at 2:00 p.m. – Pretrial conference held

Trial

March 7, 2016 – Jury Selection followed by trial

3. The parties request that the Court find this matter complex because it entails the production of considerable discovery and the resolution of potentially complicated legal issues. The Court has excluded time under the Speedy Trial Act from April 21, 2014, through March 9, 2015, to enable counsel for the defense sufficient time for pre-trial preparation. The parties stipulate and request that further time be excluded under the Speedy Trial Act between March 9, 2015, and March 7, 2016, because counsel for the defense is reviewing discovery and preparing pre-trial motions as well conducting pre-trial investigation, the matter is complex, and pre-trial motions will be filed as outlined above.

Respectfully Submitted:

MELINDA HAAG  
United States Attorney

/s

Dated: March 9, 2015

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KIM A BERGER  
HALLIE M. HOFFMAN  
Assistant United States Attorneys

/s

Dated: March 9, 2015

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